



May 12, 2025

RaPower-3 Receivership
Wayne Klein, Receiver
Klein & Associates
P.O. Box 1836
Salt Lake City, UT 84110

Invoice: 960822
Client: 176390
Matter: 4

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Litigation

Professional Services	\$ 19,411.50
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 19,411.50

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PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/07/25	JAB	Attend status conference	.20	84.00
1/10/25	JAB	Correspond with Maryn Richmond re mediation; Correspond with Wayne Klein re same	.10	42.00
1/13/25	JAB	Review mediation letter; Email Wayne Klein re same	.10	42.00
1/14/25	JAB	Correspond with Wayne Klein; Review and revise status report	.50	210.00
1/15/25	JAB	Review quarterly report; Coordinate filing of same	.50	210.00
1/29/25	JAB	Conference with Tom Melton; Telephone conference with Mike Skolnick	.40	168.00
2/03/25	JAB	Conference with Tom Melton and Wayne Klein; Draft final judgment against Glenda Johnson	1.50	630.00
2/03/25	TMM	Review complaint; Conference with Wayne Klein and Jeff Balls re Summary Judgment	1.20	618.00
2/05/25	TMM	Research patent claims and payment for summary judgment; Review Johnson and NSDP 30(b)(6) depositions re patent testimony	3.70	1,905.50
2/06/25	JAB	Draft declaration of Wayne Klein; Draft default judgment	.80	336.00
2/06/25	DSS	Meet with Thomas Melton re project to draft motions in limine to exclude experts for Nelson, Snuffer, Dahle & Poulsen	.60	186.00
2/07/25	JAB	Telephone conference with Mike Skolnick; Correspond with Wayne Klein; Finalize declaration of Wayne Klein	.80	336.00
2/07/25	DSS	Review background materials in preparation for drafting motions in limine	1.10	341.00
2/08/25	DSS	Analyze expert report and deposition testimony of Steve Dougherty in preparation for drafting motion in limine to exclude testimony; Analyze case excluding expert in closely related matter	1.90	589.00
2/10/25	DSS	Analyze pleadings, deposition testimony, past motions in limine to exclude expert testimony, past orders on motions in limine, and expert reports of Steven W. Dougherty in preparation for drafting motion in limine to exclude testimony of Steven W. Dougherty	4.10	1,271.00
2/13/25	JAB	Telephone conference with Mike Skolnick; Telephone conference with Paul Burke; Telephone conference with Wayne Klein	1.30	546.00
2/14/25	DSS	Analyze expert reports of Steven Dougherty in preparation for motion to exclude; Analyze legal issues re standard for expert testimony and when expert testimony is properly excluded in preparation for drafting motions in limine	4.60	1,426.00
2/17/25	DSS	Begin drafting motion in limine to exclude testimony of Steven Dougherty	.60	186.00
2/18/25	JAB	Draft mediation letter	1.70	714.00
2/18/25	DSS	Meet with Jeffery Balls re motions in limine; Draft portion of motion analyzing Steven Dougherty's improper legal analysis and argument in motion in limine to exclude expert testimony of Steven Dougherty	1.80	558.00
2/19/25	JAB	Email mediation letter to Judge Thurman; Telephone conference with Becky Johnson; Draft attorney planning meeting report and associated documents; Email same to Becky Johnson; Call Shawn Farris	1.60	672.00

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Date	Tkpr	Description	Hours	Amount
2/19/25	DSS	Draft portions of motion in limine to exclude Steven Dougherty re exclusion of testimony as ipse dixit, as legal analysis, or as outside the scope of previous expert report; Analyze legal cases and statutes re exclusion of experts for legal analysis or unreliable methodology for motion in limine to exclude Steven Dougherty	4.70	1,457.00
2/24/25	JAB	Correspond with Becky Johnson	.10	42.00
2/26/25	JAB	Attend mediation	4.00	1,680.00
2/26/25	DSS	Analyze expert reports of Keith Woodwell and Brent Baker and deposition testimony of Brent Baker in preparation for drafting motion in limine to exclude Brent Baker	1.40	434.00
2/27/25	DSS	Analyze deposition testimony of Brent Baker in preparation for drafting motion in limine to exclude testimony of Brent Baker	1.30	403.00
3/02/25	JAB	Review correspondence re settlement	.10	42.00
3/05/25	JAB	No Charge - Review attorney fees	.40	N/C
3/06/25	JAB	Conference with Jonathan Hafen, Joseph Covey, and Claire McGuire re settlement; Draft status report to court	1.30	546.00
3/07/25	JAB	Draft motion for entry of scheduling order; Call Shaun Farris; Draft initial disclosures; Draft discovery requests	.60	252.00
3/10/25	JAB	Draft discovery requests; Call Paul Burke	.80	336.00
3/11/25	JAB	Draft notice of filing	.30	126.00
3/12/25	JAB	Telephone conference with Wayne Klein; Telephone conference with Paul Burke	.60	252.00
3/12/25	DSS	Continue drafting motion in limine to exclude testimony of Steven Dougherty; Draft legal standard and background motion for all motions in limine re expert testimony	1.90	589.00
3/18/25	JAB	Review correspondence from Becky Johnson; Review motion to approve settlement agreement	.30	126.00
3/19/25	JAB	Telephone conference with Paul Burke re mediation; Email Wayne Klein re same	.30	126.00
3/20/25	JAB	Review pleading from Becky Johnson; Email Wayne Klein re same	.30	126.00
3/21/25	JOH	Email with opposing counsel re potential mediation; Follow up with Jeff Balls re same	.20	103.00
3/21/25	JAB	Review order approving settlement agreement; Email Wayne Klein re same; Correspond with	.10	42.00
3/25/25	JOH	Email re potential mediation of dispute with law firm	.10	51.50
3/25/25	JAB	Correspond with Paul Burke	.10	42.00
3/26/25	JOH	Further follow up re potential mediation	.10	51.50
3/26/25	JAB	Correspond with Paul Burke; Correspond with Jonathan Hafen; Telephone conference with Wayne Klein	.60	252.00
3/28/25	JAB	Telephone conference with Paul Burke	.20	84.00

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Date	Tkpr	Description	Hours	Amount
3/28/25	DSS	Finish drafting motion in limine to exclude testimony of Steven Dougherty; Revise motion in limine to exclude testimony of Steven Dougherty; Analyze legal issues for exclusion of expert testimony under Rule 702 for all motions in limine	3.80	1,178.00

TOTAL PROFESSIONAL SERVICES**\$ 19,411.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	515.00	.40	206.00
Jeffery A Balls	420.00	19.20	8,064.00
Daniel S Sorenson	310.00	27.80	8,618.00
Thomas M Melton	515.00	4.90	2,523.50
TOTALS		52.30	\$ 19,411.50

TOTAL THIS INVOICE**\$ 19,411.50**



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REMITTANCE ADVICE**RE: Litigation**

BALANCE DUE THIS INVOICE**\$ 19,411.50**

Please return this advice with payment to:

Parr Brown Gee & Loveless
P.O. Box 11019
Salt Lake City, UT 84147

Wire Transfer Instructions

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

E-Check

Name of Bank: _____
Routing #: _____
Account #: _____
Name on Account: _____
Account Holder Address: _____
Amount: \$ _____

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

3% fee for credit card transactions*Please reference your invoice # 960822****Online Payments:** <https://parrbrown.com/payment-portal>**Payments accepted by phone (801) 532-7840**

Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid
within thirty (30) days after the date of this invoice